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10 Attorneys for Defendant,
SEAGATE TECHNOLOGY LLC

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

15 IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

17 CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

**DECLARATION OF PATRICK DEWEY
IN SUPPORT OF SEAGATE'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

Date: March 30, 2018
Time: 9:30 a.m.
Place: Courtroom G
Judge: Hon. Joseph C. Spero

Second Consolidated Amended Complaint
filed: July 11, 2016

24 **REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

DECLARATION OF PATRICK DEWEY

I, Patrick Dewey, declare as follows:

1. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

2. I received a B.S. in Electrical Engineering from the University of Nebraska in 1980.

3. I have worked as an engineer in the hard drive industry for over 37 years. For much of that time, I have been responsible for the design, development and transfer to mass production of hard disk drive products. I have also worked as a reliability and failure analysis engineer. I began working at a company called Control Data Corporation, where I worked from 1973 to 1975 (before college) and again during the end and after college. At Control Data Corporation I worked on test equipment maintenance and repair, and as I got my degree I moved into quality engineering. From 1981 to 1982 I worked as a reliability engineer for Brown Disc Manufacturing. As a reliability engineer, I was responsible for testing our hard disk drive products and ensuring that they met its specifications before shipment. From 1982 to 1985 I worked as a failure analysis engineer for MiniScribe determining the causes and corrective actions for hard disk drives that did not pass testing. From 1985 to 1992, I worked at Maxtor, as an engineer developing disk drives and managing a team of engineers that developed disk drives. In 1992 I joined Conner Peripherals. At Conner, I was the lead of a design group, meaning I was the Program manager, managing the development of new hard drives. In 1996, Conner was acquired by Seagate in Technology LLC ("Seagate") and I joined Seagate at that time, continuing my role managing the development of hard disk drives, at Seagate's Colorado facility. I then worked for a time in advanced drive development, in which I examined and determined the existing capabilities and new technologies that would have to be used to be able to build new (advanced) hard drives. Then for 4-5 years, I was a core team lead, meaning I managed teams that would design and develop a drive, launch it, and then transfer it into mass production. For a time, I was a super core team lead, meaning I managed all other core team leaders. In 2008 I again became a core team lead and have had that position ever since. I was core team lead for the Grenada hard drives, including the Grenada Classic, Grenada BP and Grenada BP2, in which role I oversaw the design, development and transfer to mass production of these

1 drives. The team I managed oversaw the reliability testing for the Grenada drives and was
2 responsible for corrective actions required. I prepared many of the documents that Hospodor cites
3 in his declaration, including the shipping approval (qualification) documents for the Grenada Classic
4 SBS release, Grenada Classic disty/OEM release, Grenada BP SBS release, Grenada BP disty/OEM
5 release, and Grenada BP2 release.

6 4. I have reviewed the declaration of Andrew Hospodor (“Hospodor”) filed in support
7 of Plaintiffs’ Motion for Class Certification. Hospodor reviewed internal Seagate documents and
8 stated opinions he claims are based on those documents. However, as explained below, many of
9 Hospodor’s statements regarding the development, reliability testing, functioning and failure of hard
10 drives (and of the Grenada drives) misinterpret Seagate documents and are clearly erroneous.

11 **A. Background on Seagate Drive Development**

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¹ All Exhibit numbers refer to the exhibits to the Declaration of Lien Payne.

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Figure 1 (Ex. 3 [FED_SEAG0026867] at 26881.)

The image shows a document page with a vertical line on the left side. The page contains several lines of text, most of which are obscured by horizontal black redaction bars. The redactions are as follows:

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- A long redaction bar covering the first line of text.
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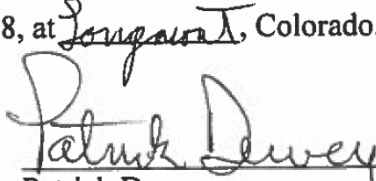
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10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Executed on this 4 day of January, 2018, at Longmont, Colorado.

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